IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

JACK D. McCULLOUGH,)
Plaintiff,) Case No. 2017 cv 50116
) Judge: Frederick J. Kapala
V.) Magistrate Judge: Iain D. Johnston
BRION HANLEY, et al.,) Magistrate Judge. fam D. Johnston
Defendants.)

MOTION TO CONTINUE HEARING ON MOTION TO QUASH SUBPOENAS

NOW COMES DEKALB COUNTY PUBLIC DEFENDER'S OFFICE by and through its attorneys, Jerrod L. Barenbaum and Jessica A. Cushard of Hinshaw & Culbertson, LLC, acting as Special Assistant State's Attorneys, moves to Continue the Hearing on the Motion to Quash the Subpoenas issued to Thomas McCulloch and Crystal Harrolle, in their capacity as representatives of the DeKalb County Public Defender's Office, pursuant to FRCP 45(d), and in support there, states as follows:

- 1. Hearing on DeKalb County Public Defender's Office's Motion to Quash Subpoenas is currently scheduled for October 4, 2018.
- 2. Counsel for the DeKalb County Public Defender's Office and counsel for the Office of the Illinois Attorney General are in the process of discussing the subpoenas which are the subject of the pending Motion to Quash, and believe there is a good chance that the parties will be able to resolve this dispute without the need for the pending Motion to Quash being argued and ruled upon by the Court.
 - 3. The discussions and efforts between counsel to resolve this issue are ongoing.

4. Pursuant to agreement between counsel for DeKalb County Public Defender's Office and counsel for the Office of the Illinois Attorney General the pending Motion to Quash be continued to December 20, 2018.

Dated: October 3, 2018 Respectfully submitted,

HINSHAW & CULBERTSON LLP

/s/ Jerrod L. Barenbaum

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